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FAA-02-14081-25

SINGAPORE AIRLINES LIMITED



The Document Management System
FAA Docket Number FAA-2002-14081 -
US Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington DC, DC 20590-0001
United States of America

17 March 2003

Dear Sir,

**FAA NPRM ON TRANSPONDER CONTINUOUS OPERATION
(DOCKET No FAA-2002-14081; NPRM No 03-02)**

Singapore Airlines ("SIA") is the national flag carrier of the Republic of Singapore. We operate our fleet of 747-400 and 777-200ER to the United States of America as a Part 129 operator.

2. We are opposed to this proposed rule on transponder for reasons as follows:-

- (a) *Redundant Security Measure.* It is of little added security benefits to introduce this requirement especially now that the aircraft security has been enhanced by the Phase II cockpit door and other security measures such as flight deck surveillance camera, upgraded ground security checks and selective deployment of air marshals.
- (b) *Added Financial Burden.* Following the September 11 event, airlines' spending on security measures have increased many folds amidst much reduced demands for air travel. This has caused severe financial strain to many airlines. It is therefore important not to further strain the airlines financially with enhancement of little security benefits.
- (c) *Negative Flight Safety Impact.* There is risk associated with flight escort by the U.S. security forces in the event of an activation. This rule will expose the airlines to such risk unnecessarily in the event of an inadvertent activation or a failed hijack attempt. Our greater concern is that as this rule is being adopted worldwide by other authorities, the risk will increase markedly as there is no coordinated international procedure for such flight escort.

3. We urge the FAA to re-evaluate the risk, cost and benefit, and financial impact of this rule on the airlines.

4. Thank you for your understanding of the issues raised above.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Sirisena', with a stylized, cursive script.

M. Sirisena
Senior Vice President Engineering